REMARKS

The Examiner is thanked for the performance of a thorough search. Claims 1, 18, 32, and 44-45 are amended. Hence, Claims 1-47 are now pending in the application. No new matter has been introduced.

ISSUES RELATING TO PRIOR ART

Each of the pending claims as amended recites at least one element that is not disclosed, taught, or otherwise suggested by the cited art, either individually or in combination. Accordingly, the rejections are respectfully traversed.

A. Independent Claim 1

Claim 1 stands rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over *de Silva et al.* (US 6,615,347), hereinafter "*de Silva*", in view of *England et al.* (U.S. Pat. Pub. No. 2007/0174921), hereinafter "*England*". Claim 1 recites:

> *without parsing or interpreting any data structures in the first security certificate or the second security certificate*:
>
> comparing *in memory a binary representation of the entire second security certificate to a binary representation of the entire first security certificate*; and
>
> confirming the sender's identity only when the *binary representation of the second security certificate* matches the *binary representation of the first security certificate* for the sender.

(Emphasis added.)

In the Final Office Action dated November 28, 2007, the Examiner has admitted that *de Silva* does not teach or otherwise suggest the feature of "comparing in memory a binary representation of the entire second security certificate to a binary representation of the entire firs security certificate". However, in the Advisory Action dated April 8, 2008, the Examiner re-cited *de Silva* as allegedly disclosing this feature, citing that *de Silva* teaches the identification of digital certificates based on data about subscribers contained in the digital certificate and asserting that all comparison of digital information is necessarily performed in binary form.

Applicants respectfully disagree. As Applicants described in detail in the Reply to Office Action dated September 19, 2007, *de Silva* is limited to using data contained **within** a digital certificate to determine whether an existing digital certificate has been changed, and thus requires advance knowledge of the digital certificate's data structure in order to access and parse the certificate serial number and/or digital signature. On the other hand, Claim 1 requires the comparison of binary representations of the **entirety** of two security certificates, which obviates the need for advance knowledge of the certificates' data structures. Paragraph 102 of Applicants' specification describes performing a bit-by-bit binary comparison rather than conventional parsing and interpretation of abstract data structures. The teachings of *de Silva* do not suggest the comparison of binary representations of **entire digital certificates**. In light of this, whether the comparisons of **data structures within digital certificates** in de Silva are performed in binary form is moot. Either way, *de Silva* would not teach the comparison, in binary form, of entire digital certificates, as recited in Claim 1.

To further clarify this distinction between the teachings of *de Silva* and the features of Claim 1, Applicants have amended Claim 1 to explicitly recite that the step of "comparing in memory a binary representation of the entire second security certificate to a binary representation of the entire firs security certificate" is performed "**without parsing or interpreting any data structures in the first security certificate or the second security certificate**" (emphasis added). Applicants respectfully submit that this amendment is well-supported by the Specification (see paragraph [0102]).

Furthermore, as explained in the Reply to Final Office Action dated January 25, 2008, the *England* reference also does not teach or otherwise suggest the features of Claim 1 emphasized above. What *England* describes is comparing a certificate associated with an executable binary to certificates in a list of approved certificates for verification purposes (*England* [0158]). The certificates in *England* are associated with executable binaries, but the executable binaries do not represent the certificates in any way (rather, the executable binaries represent executable software code). Moreover, *England* teaches that the comparison of certificates is performed by comparing the "certificate hashes" or other "public key representations or encodings" (see *England* paragraphs [0129], [0130], and [0132]). Therefore, *England* also does not teach "without parsing or interpreting any data structures in the first security certificate or the second security certificate, comparing in memory a binary representation of the entire second security certificate to a binary representation of the entire first security certificate".

Accordingly, since neither *de Silva* nor *England*, individually or in combination, teach or otherwise suggest the limitations of comparing binary representations of the entire received digital certificate to an existing digital certificate in memory, Claim 1 is non-obvious over *de Silva* in view of *England*. Applicant respectfully requests reconsideration and withdrawal of Examiner's obviousness rejection of Claim 1.

B. Independent Claims 18, 32, 44, and 45

Independent Claims 18, 32, 44 and 45 recite features analogous to those provided in amended Claim 1. Since *de Silva* and *England* do not teach or otherwise suggest the limitations of comparing binary representations of the entire received digital certificate to an existing digital certificate in memory, Claims 18, 32, 44 and 45 are patentable over *de Silva* and *England* for the same reasons given above with respect to claim 1. Reconsideration is respectfully requested.

C. Dependent Claims 2-17, 19-31, 33-41, 43, and 47

Claims 2-17, 19-31, 33-41, 43, and 47 stand rejected under 35 U.S.C. § 102(e). Claims 2-17, 19-31, 33-43, and 47 depend directly or indirectly from Claims 1, 18, 32, 44, 45 and therefore include each and every feature recited in independent Claims 1, 18, 32, 44, 45. Accordingly, claims 2-17, 19-31, 33-41, 43, and 47 are allowable for the same reasons given above for claims 1, 18, 32, 44, 45. Reconsideration is respectfully requested.

D. Dependent Claim 42

Claim 42 stands rejected under 35 U.S.C. § 103 (a) as allegedly obvious over *de Silva* in view of US patent application publication US 2003/0037234 to *Fe et al.*

Claim 42 depends from independent Claim 32 and therefore includes each and every feature recited in claim 32. For the reasons given above, claim 32 is patentable over *de Silva* in view of *England*. Further, *Fe et al.* fails to cure the deficiencies of *de Silva* and *England* with respect to the distinguishing features of claim 32—in particular, *Fe et al.* has no description, teaching or suggestion to perform a comparison between binary representations of security certificates. Therefore, any combination of *de Silva*, *England* and *Fe et al.* fails to provide for the complete combination that is recited in claim 42. Reconsideration is respectfully requested.

E. Dependent Claims 46

Dependent Claim 46 provides an additional comparison feature which utilizes the length in memory of the first and second digital certificates to determine whether any changes have occurred.

Claims 46 depends from independent Claim 45 and therefore includes each and every feature recited in Claim 45. Claim 45 recites the same features discussed above for claim 1 and therefore claim 45 is patentable over the cited references for the same reasons given above for claim 1. Accordingly,

claim 1. Accordingly, dependent Claim 46 is patentable over *de Silva* in view of *England* for the same reasons given above for claim 1 and also because the additional features recited in Claim are not found in *de Silva* or *England*.

The Office Action alleged that the feature of utilizing the length in memory of the first and second digital certificates for comparison is disclosed in *England*. However, while *England* discloses the comparison of certificates, it does not disclose ***how*** this comparison is performed; specifically, there is no teaching in *England* of ***utilizing lengths of certificates for comparison purposes***.

Favorable consideration is respectfully requested.

III. CONCLUSIONS & MISCELLANEOUS

For the reasons set forth above, all of the pending claims are now in condition for allowance. The Examiner is respectfully requested to contact the undersigned by telephone relating to any issue that would advance examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, the petition for extension of time fee and other applicable fees are submitted concurrently herewith. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,
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Dated: May 5, 2008

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